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In the United States District Court
Northern District of Illinois, Eastern Division

Jacqueline Fegan,

Plaintiff,

v.

Robert Reid #17285, *et. al.*,

Defendants.

No.: 06 CV 6767

Judge Lefkow

Plaintiff's Response in Opposition to Defendants' Motion for Partial Summary Judgment

Plaintiff Jacqueline Fegan states as follows:

1. Defendants seek partial summary judgment against the plaintiff. The individual defendants claim they are entitled to summary judgment in their favor as to Fegan's Counts I, III, IV and V. Defendant City of Chicago seeks summary judgment as to the sole count against it, Count IX.

2. The record and applicable case law establish that Defendants' joint motion is predicated upon deeply contested facts and inapplicable law and that therefore they are not entitled to summary judgment on the counts at issue. In support of her response, Plaintiff submits her brief in opposition to the Defendants' Motion for Partial Summary Judgment.

Wherefore the plaintiff prays this court deny the defendants' motion for partial summary judgment and for such other and further relief the court determines is warranted.

August 31, 2009

Respectfully Submitted,

Jacqueline Fegan, plaintiff,

By: s/ Craig D. Tobin
One of their attorneys

Certificate of Service

I hereby certify that I served the foregoing using the court's CM/ECF system which will send notification of such filing to the counsel of record.

August 31, 2009

s/ Craig D. Tobin
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